

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001**Permittee:** P₄ Production, LLC
Location: Soda Springs, Idaho**Project No.:** T1-9508-127-1**Date Issued:** December 30, 2002
Date Expires: December 30, 2006*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***13. EMISSIONS POINT 12 - No. 9 CO Baghouse****Summary Description**

The following requirements apply generally to emissions from the transfer points associated with moving material from belts 420W and 420E to the furnace No. 9 stock bins.

Table 13.1 describes the devices used to control emissions from Emissions Point 12 emissions sources.

Table 13.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
589.00	E/W 420 pivot belt to bins 901-912	No. 9 CO baghouse
592.00	Bins 901-912	No. 9 CO baghouse

Table 13.2 contains a summary of the requirements that apply to the sources controlled by the No. 9 CO baghouse. Specific permit requirements are listed below.

Table 13.2 NO. 9 CO BAGHOUSE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
13.1	Particulate matter	7.88 lb/hr, 32.4 T/yr; Process weight	Operating Permit No. 029-00001; IDAPA 58.01.01.702, 4/5/00	13.3, 13.4, 13.5, 13.7, 13.8, 13.10
13.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, 4/5/00	1.8, 13.6, 13.9

Permit Limits/Standards Summary

- 13.1 The PM emissions shall not exceed 7.88 lb/hr, as determined by EPA Reference Method 5 or an approved alternative emissions test. Annual PM emissions shall not exceed 32.4 T/yr, as determined by multiplying the actual emission rate measured by EPA Reference Method 5 or an approved alternative emissions test, by the actual hours of operation per year. The allowable hourly emission rate may be multiplied by the actual hours of operation per year if the actual emission rate is not available.
[Operating Permit No. 029-00001, Section 2.4.1, 10/23/00; IDAPA 58.01.01.702, 4/5/00]
- 13.2 Visible emissions from the No. 9 CO baghouse stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 12, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
[IDAPA 58.01.01.625, 4/5/00]

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Operating Requirements

- 13.3 All equipment controlling emissions from the process shall be operated at all times that material is handled within the process.
[Operating Permit No. 029-00001, Section 3.1, 10/23/00]
- 13.4 The permittee shall install, operate, calibrate, and maintain instrumentation to accurately measure and indicate the pressure drop across each baghouse controlling emissions from the process.
[Operating Permit No. 029-00001, Section 4.3.1, 10/23/00]
- 13.5 The permittee shall install and operate equipment to measure, or develop methods to determine, the pounds per hour and tons per year of material handled throughout the process.
[Operating Permit No. 029-00001, Section 4.1, 10/23/00]
- 13.6 Maintenance shall be performed on each baghouse that has visible emissions exceeding 5% opacity. A measured opacity of 20% or less will not constitute a violation of this permit.
[Operating Permit No. 029-00001, Section 4.3.2, 10/23/00]

Monitoring and Recordkeeping Requirements

- 13.7 Once each week, the permittee shall monitor and record the pressure drop across the baghouse and the plant compressed air pressure.
[IDAPA 58.01.01.322.06, 5/1/94]
- 13.8 The permittee shall maintain records containing the following:
- 13.8.1 The hourly throughput of the process.
- 13.8.2 The calculated annual emissions from the process.
- 13.8.3 The hours of operation for each month and for the previous consecutive 12-month period.
- 13.8.4 These records shall be maintained in accordance with Permit Condition 1.11.
[IDAPA 58.01.01.322.06, 5/1/94]
- 13.9 The permittee shall conduct a PM compliance test on the No. 9 baghouse in accordance with the procedures outlined in 40 CFR Part 60, Appendix A, Method 5 or a Department-approved alternative method, within 270 days of issuance of the permit.

If the PM emission rate measured in the initial compliance test is less than or equal to 75% of the emission standard in Permit Condition 13.1, no further testing shall be required during this permit term. If the PM emission rate measured during the compliance test is greater than 75%, but less than or equal to 90% of the emission standard in Permit Condition 13.1, a second test shall be required in the third year of the permit term.

If the PM emission rate measured during the compliance test is greater than 90% of the emission standard in Permit Condition 13.1, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.09, 5/1/94]

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The following requirements apply generally to emissions from the transfer points associated with moving material from belt 416 to belts 713, 714, 12W, 12E, 420 W, or 420E, in addition to various points along belts 713, 714, 12W, 12E, 420W, and 420E. Dust from the three CO baghouses is pneumatically conveyed to the furnace stocking system baghouse.

Table 14.1 describes the devices used to control emissions from Emissions Point 13 emissions sources.

Table 14.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
524.00	Belt 416 burden to 421 distributor	Main stocking system baghouse
525.00	421 distributor to belt 417	Main stocking system baghouse
526.00	421 distributor to belt 418	Main stocking system baghouse
527.00	421 distributor to belt 419	Main stocking system baghouse
528.00	417 burden belt	Main stocking system baghouse
529.00	418 burden belt	Main stocking system baghouse
530.00	419 burden belt	Main stocking system baghouse
531.00	Belt 417 feed to 672 distributor	Main stocking system baghouse
535.00	672 distributor to south twin belt	Main stocking system baghouse
537.00	672 distributor to north twin belt	Main stocking system baghouse
561.00	Belt 418 Feed to E/W pivot belt	Main stocking system baghouse
563.00	E/W pivot belt	Main stocking system baghouse
585.00	Belt 419 to E/ 420 pivot belt	Main stocking system baghouse
587.00	E/W 420 pivot belt	Main stocking system baghouse

Table 14.2 contains a summary of the requirements that apply to the sources controlled by the main stocking system baghouse. Specific permit requirements are listed below Table 14.2.

Table 14.2 MAIN (FURNACE) STOCKING SYSTEM BAGHOUSE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
14.1	Particulate matter	17.63 lb/hr, or IDAPA 58.01.01.702, 77.2 T/yr	Operating Permit No. 029-00001 IDAPA 58.01.01.702	14.3, 14.4, 14.5, 14.7, 14.8, 14.9
14.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, 4/5/00	1.8, 14.6

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Permit Limits/Standards Summary

- 14.1 The PM emissions shall not exceed the emission limit set in IDAPA 58.01.01.702, or 17.63 lb/hr, whichever is more restrictive, as determined by EPA Reference Method 5 or an approved alternative emissions test. Annual PM emissions shall not exceed 77.2 T/yr, as determined by multiplying the actual emission rate measured by EPA Reference Method 5 or an approved alternative emissions test, by the actual hours of operation per year. The allowable hourly emission rate may be multiplied by the actual hours of operation per year if the actual emission rate is not available.
[IDAPA 58.01.01.702, 4/5/00; Operating Permit No. 029-00001, Section 2.5.1, 10/23/00]
- 14.2 Visible emissions from the main stocking system baghouse stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 13, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
[IDAPA 58.01.01.625, 4/5/00]

Operating Requirements

- 14.3 All equipment controlling emissions from the process shall be operated at all times that material is handled within the process.
[Operating Permit No. 029-00001, Section 3.1, 10/23/00]
- 14.4 The permittee shall install, operate, calibrate, and maintain instrumentation to accurately measure and indicate the pressure drop across the baghouse controlling emissions from the process.
[Operating Permit No. 029-00001, Section 4.3.1, 10/23/00]
- 14.5 The permittee shall install and operate equipment to measure, or develop methods to determine, the pounds per hour and tons per year of material handled throughout the process.
[Operating Permit No. 029-00001, Section 4.1, 10/23/00]
- 14.6 Maintenance shall be performed on each baghouse that has visible emissions exceeding 5% opacity. A measured opacity of 20% or less will not constitute a violation of this permit.
[Operating Permit No. 029-00001, Section 4.3.2, 10/23/00]

Monitoring and Recordkeeping Requirements

- 14.7 Once each week, the permittee shall monitor and record the pressure drop across the baghouse and the plant compressed air pressure. These records shall be maintained in accordance with Permit Condition 1.11.
[IDAPA 58.01.01.322.06, 5/1/94]
- 14.8 The permittee shall maintain records containing the following:
- 14.8.1 The hourly throughput of the process.
- 14.8.2 The calculated annual emissions from the process.
- 14.8.3 The hours of operation for each month and for the previous consecutive 12-month period.
- 14.8.4 These records shall be maintained in accordance with Permit Condition 1.11.
[IDAPA 58.01.01.322.06, 5/1/94]

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- 14.9 The permittee shall conduct a PM compliance test on the main stocking system baghouse in accordance with the procedures outlined in 40 CFR Part 60, Appendix A, Method 5 or a Department-approved alternative method, within 270 days of issuance of the permit.

If the PM emission rate measured in the initial compliance test is less than or equal to 75% of the emission standard in Permit Condition 14.1, no further testing shall be required during this permit term. If the PM emission rate measured during the compliance test is greater than 75%, but less than or equal to 90% of the emission standard in Permit Condition 14.1, a second test shall be required in the third year of the permit term. If the PM emission rate measured during the compliance test is greater than 90% of the emission standard in Permit Condition 14.1, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.09, 5/1/94]

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15. EMISSIONS POINT 14 - Nodule Reclaim Baghouse**Summary Description**

The nodule reclaim baghouse controls emissions from nodule handling. The specific emissions points are belt 300 to raw nodule storage, raw nodule dump to reclaim hopper.

Table 15.1 describes the devices used to control emissions from Emissions Unit 14 emissions sources.

Table 15.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
403.00	Belt 300 nodules to raw nodule storage	Nodule reclaim baghouse
405.00	Raw nodule dump to reclaim hopper	Nodule reclaim baghouse

Table 15.2 contains a summary of the requirements that apply to the sources controlled by the nodule reclaim baghouse. Specific permit requirements are listed below Table 15.2.

Table 15.2 NODULE RECLAIM BAGHOUSE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
15.1	Particulate matter	Process weight	IDAPA 58.01.01.702, 4/5/00	15.3, 15.4
15.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, 4/5/00	1.8

Permit Limits/Standards Summary

15.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the design process weight in pounds per hour.

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

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- 15.2 Visible emissions from the nodule reclaim baghouse stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 14, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
- [IDAPA 58.01.01.625, 4/5/00]

Monitoring and Recordkeeping Requirements

- 15.3 Once each week, the permittee shall monitor and record the pressure drop across the baghouse and the plant compressed air pressure.
- [IDAPA 58.01.01.322.06, 5/1/94]
- 15.4 The permittee shall maintain records containing the following:
- 15.4.1 The maximum hourly throughput of the process.
 - 15.4.2 The calculated emission limitation using the maximum throughput rate for nodule handling and the formula in Permit Condition 15.1.
 - 15.4.3 The calculated average hourly emissions using an emission factor of 0.01 gr/dscf, unless actual emission data is available.
 - 15.4.4 The hours of operation for each month and for the previous consecutive 12-month period.
 - 15.4.5 These records shall be maintained in accordance with Permit Condition 1.11.
- [IDAPA 58.01.01.322.06, 5/1/94]

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The SDM vent filter controls emissions from the SDM blow to the hopper.

Table 16.1 describes the devices used to control emissions from Emission Point 15 emissions sources.

Table 16.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
429.00	SDM blow to hopper	SDM vent filter

Table 16.2 contains a summary of the requirements that apply to the SDM vent. Specific permit requirements are listed below Table 16.2.

Table 16.2 SDM BAGHOUSE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
16.1	Particulate matter	Process weight	IDAPA 58.01.01.701	16.3, 16.4
16.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8

Permit Limits/Standards Summary

16.1 No person shall emit to the atmosphere from any process or process equipment commencing operation on or after October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the design process weight in pounds per hour.

- a. If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- b. If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 16.2 Visible emissions from the SDM vent stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 15, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

Monitoring and Recordkeeping Requirements

- 16.3 Once every six months, the permittee shall visually inspect the bags for damage. If the bags are found to be damaged (holes, tears, etc.), the bag(s) shall be replaced.
- 16.4 The permittee shall maintain records containing the following:
- 16.4.1 The maximum hourly throughput of the process.
 - 16.4.2 The calculated emission limitation using the maximum hourly process weight rate and the formula in Permit Condition 16.1.
 - 16.4.3 The calculated hourly emissions from the process using an emission factor of 0.01 gr/dscf, unless actual emission data is available.
 - 16.4.4 The hours of operation for each month and for the previous consecutive 12-month period.
 - 16.4.5 These records shall be maintained in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06, 5/1/94]

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17. EMISSIONS POINT 16 - Nodule-Crushing and Screening Scrubber

Summary Description

The following requirements apply generally to emissions from the transfers associated with moving quartzite from the Q2 belt to the quartzite bins or scaleroom quartzite bin, and emissions from the transfer points associated with nodule conveying, sizing, crushing, and screening.

Table 17.1 describes the devices used to control emissions from Emissions Point 16 emissions sources.

Table 17.1 EMISSIONS UNIT 16 CONTROL DEVICE

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
140.10	North and south dried quartzite screens	Nodule-crushing and screening scrubber
140.15	North and south undried quartzite screens	Nodule-crushing and screening scrubber
141.00	Bin 1 dried quartzite Loading	Nodule-crushing and screening scrubber
141.05	Bin 1 undried quartzite Loading	Nodule-crushing and screening scrubber
141.2	Q2 belt unloading – dried quartzite	Nodule-crushing and screening scrubber
141.3	Q2 belt unloading – undried quartzite	Nodule-crushing and screening scrubber
142.00	Dried quartzite fines to conveyor belt loading	Nodule-crushing and screening scrubber
142.05	Undried quartzite fines to conveyor belt loading	Nodule-crushing and screening scrubber
144.00	Dried quartzite fines unloading to fines silo	Nodule-crushing and screening scrubber
144.05	Undried quartzite fines unloading to fines silo	Nodule-crushing and screening scrubber
401.00	Belt 265 nodules to distributor (300, 289)	Nodule-crushing and screening scrubber
406.1	Reclaim hopper to belt 882	Nodule-crushing and screening scrubber
409.00	Coarse gundlach crusher	Nodule-crushing and screening scrubber
410.00	273 gundlach crusher	Nodule-crushing and screening scrubber
411.1	Belt 888 pan discharge	Nodule-crushing and screening scrubber
413.00	289, 882 and reclaim elevator to top screen splitter	Nodule-crushing and screening scrubber
414.00	East and west top sizing screens	Nodule-crushing and screening scrubber
415.00	Nodules to 290 elevator	Nodule-crushing and screening scrubber
416.00	Nodules to 291 elevator	Nodule-crushing and screening scrubber
417.00	Nodules to splitters	Nodule-crushing and screening scrubber
418.00	North and south quad deck screens	Nodule-crushing and screening scrubber
419.00	North and south fine to belt 880	Nodule-crushing and screening scrubber
420.00	North and south medium to belt 879	Nodule-crushing and screening scrubber
421.00	North and south coarse to belt 878	Nodule-crushing and screening scrubber
425.00	Fine nodules to bins 4 and 5	Nodule-crushing and screening scrubber
426.00	Medium nodules to bins 2 and 3	Nodule-crushing and screening scrubber
427.00	Coarse nodules to bins 6 and 7	Nodule-crushing and screening scrubber
428.00	SDM to blow tank	Nodule-crushing and screening scrubber
430.00	SDM silo unloading spout	Nodule-crushing and screening scrubber
430.1	SDM overflow/bypass bunker	Nodule-crushing and screening scrubber

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Table 17.2 contains a summary of the requirements that apply to the sources controlled by the nodule-crushing and screening scrubber. Specific permit requirements are listed below Table 17.2.

Table 17.2 **NODULE-CRUSHING AND SCREENING SCRUBBER APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
17.1	Particulate matter	36.86 lb/hr or IDAPA 58.01.01.702, 158.5 T/yr	Operating Permit No.029-00001, Section 2.4.1, 10/19/00 IDAPA 58.01.01.702	17.3, 17.4, 17.5, 17.6, 17.8, 17.9, 17.10
17.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, 4/5/00	1.8, 17.7

Permit Limits/Standards Summary

17.1 The PM emissions shall not exceed the emission limit set in IDAPA 58.01.01.702, or 36.86 lb/hr, whichever is more restrictive, as determined by EPA Reference Method 5 or an approved alternative emissions test. Annual PM emissions shall not exceed 158.5 T/yr, as determined by multiplying the actual emission rate measured by EPA Reference Method 5 or an approved alternative emissions test, by the actual hours of operation per year. The allowable hourly emission rate may be multiplied by the actual hours of operation per year if the actual emission rate is not available. If the average process weight rate measured during the source test(s) is below 416,600 lb/hr, the governing limit is found using the following equations where E is the allowable emissions from the entire source in pounds per hour, and PW is the worst-case process weight in pounds per hour.

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00; Operating Permit No. 029-00001, Section 2.4.1, 10/19/00]

17.2 Visible emissions from the nodule-crushing and screening scrubber stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 16, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

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Operating Requirements

- 17.3 The permittee shall conduct a PM compliance test on the nodule crushing and screening scrubber in accordance with the procedures outlined in 40 CFR Part 60, Appendix A, Method 5, or Department-approved alternative method. The next test is required no later than December 2003.

If the PM emission rate measured in the compliance test is less than or equal to 75% of the emission standard in Permit Condition 17.1, no further testing shall be required during this permit term. If the PM emission rate measured during the compliance test is greater than 75%, but less than or equal to 90% of the emission standard in Permit Condition 17.1, a second test shall be required in the third year of the permit term. If the PM emission rate measured during the compliance test is greater than 90% of the emission standard in Permit Condition 17.1, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.09, 5/1/94]

- 17.4 The permittee shall install, operate, calibrate, and maintain instrumentation to accurately measure and indicate the pressure drop across the scrubber, and instrumentation to accurately measure and indicate the water flow rate to the scrubber.

[Operating Permit No. 029-00001, Section 4.2.1, 10/23/00]

- 17.5 All equipment controlling emissions from the process shall be operated at all times that material is handled within the process.

[Operating Permit No. 029-00001, Section 3.1, 10/23/00]

- 17.6 The permittee shall install and operate equipment to measure, or develop methods to determine, the pounds per hour and tons per year of material handled throughout the process.

[Operating Permit No. 029-00001, Section 4.1, 10/23/00]

- 17.7 Maintenance shall be performed to the scrubber when visible emissions exceed 15% opacity. A measured opacity of 20% or less will not constitute a violation of this permit.

[Operating Permit No. 029-00001, Section 4.2.2, 10/23/00]

- 17.8 The scrubber shall be operated so that the scrubber solution flow rate is maintained above 80% of the solution flow rate recorded during the Department-approved compliance test. Deviations from the allowable operating range may not by themselves be considered deviations from applicable emissions standards (i.e., Permit Condition 17.1), unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required.

[IDAPA 58.01.01.322.01, 5/1/94]

Monitoring and Recordkeeping Requirements

- 17.9 The pressure drop and scrubber solution flow rate shall be monitored and recorded once each week. These records shall be maintained in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06, 5/1/94]

- 17.10 The permittee shall maintain records containing the following:

17.10.1 The hourly throughput of the process.

17.10.2 The maximum calculated process weight rate limitation using the formula in Permit Condition 17.1 if the process weight rate attained during the Department-approved compliance test is below 416,600 lb/hr.

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17.10.3 The calculated annual emissions from the process.

17.10.4 The hours of operation for each month and for the previous consecutive 12-month period.

17.10.5 These records shall be maintained in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001**Permittee:** P₄ Production, LLC
Location: Soda Springs, Idaho**Project No.:** T1-9508-127-1**Date Issued:** December 30, 2002**Date Expires:** December 30, 2006*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***18. EMISSIONS POINT 17 - No. 7 Tap Hole Fume Collector****Summary Description**

The following requirements apply generally to emissions from slag tapping and electrostatic precipitator dust oxidation from the No. 7 furnace, which are controlled by a cyclonic separator and venturi scrubber known as the No. 7 tap hole fume collector (THFC). The No. 7 THFC may be used to control emissions from the seal pots (see section 21) when the No. 9 THFC is down.

Table 18.1 describes the devices used to control emissions from Emissions Point 17 emissions sources.

Table 18.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
546.00	FeP Slag Tapping ¹	No. 7 THFC
547.00	CaSi Slag Tapping ²	No. 7 THFC
556.10	No. 7 Treater Dust Burning Chamber	No. 7 THFC

¹ Ferrophosphorus² Calcium Silicate

Table 18.2 contains a summary of the requirements that apply to the sources controlled by the No. 7 THFC. Specific permit requirements are listed below Table 18.2.

Table 18.2 NO. 7 TAP HOLE FUME COLLECTOR (THFC) APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
18.1	Particulate matter	0.2 lb/T of material fed to furnace, Process weight	Operating Permit No. 13- 0420-0001-07, 7/18/79 IDAPA 58.01.01.702, 4/5/00	18.3, 18.4, 18.5, 18.6, 18.7
18.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, 4/5/00	1.8

Permit Limits/Standards Summary

- 18.1 The PM emissions from the No. 7 venturi stack shall not exceed 0.2 lb/T of material fed to the furnace.
[Operating Permit No. 13-0420-0001-07, 7/18/79; IDAPA 58.01.01.702, 4/5/00]
- 18.2 Visible emissions from the No. 7 THFC stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 17, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
[IDAPA 58.01.01.625, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P ₄ Production, LLC	Project No.: T1-9508-127-1	Date Issued: December 30, 2002
Location: Soda Springs, Idaho		Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Operating Requirements

- 18.3 The permittee shall conduct a PM compliance test on the No. 7 THFC prior to December 31, 2003, in accordance with the procedures outlined in 40 CFR Part 60, Appendix A, Method 5 or a Department-approved alternative method.

If the PM emission rate measured in the compliance test is less than or equal to 75% of the emission standard in Permit Condition 18.1, no further testing shall be required during this permit term. If the PM emission rate measured during the compliance test is greater than 75%, but less than or equal to 90% of the emission standard in Permit Condition 18.1, a second test shall be required in the third year of the permit term. If the PM emission rate measured during the compliance test is greater than 90% of the emission standard in Permit Condition 18.1, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.09, 5/1/94]

- 18.4 The permittee shall install equipment to measure, or develop methods to determine, the pounds per hour of material handled throughout the process.

[IDAPA 58.01.01.322.06, 5/1/94]

- 18.5 The scrubber shall be operated so that the pressure drop across the scrubber and scrubber fluid flow rate are maintained at or above 80% of the pressure drop and solution flow rate recorded during the Department-approved compliance test. Deviations from the allowable operating range may not by themselves be considered deviations from applicable emissions standards (i.e., Permit Condition 18.1), unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required.

[IDAPA 58.01.01.322.01, 5/1/94]

Monitoring and Recordkeeping Requirements

- 18.6 Once each week, the permittee shall monitor and record the pressure drop across the scrubber, fan current, and fluid flow rate to the scrubber.

[IDAPA 58.01.01.322.06, 5/1/94]

- 18.7 The permittee shall maintain records containing the following:

18.7.1 The daily average hourly process weight rate.

18.7.2 The daily average calculated hourly emission limitation using the 0.2 lb/T emission limit if the process weight rate is less than 352,000 lb/hr. If the process weight rate is greater than 352,000 lb/hr, the permittee shall calculate the maximum hourly emission limitation using the formula in Permit Condition 18.1.

18.7.3 These records shall be maintained in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

19. EMISSIONS POINT 18 - No. 8 Tap Hole Fume Collector**Summary Description**

The following requirements apply generally to emissions from slag tapping and electrostatic precipitator dust oxidation from the No. 8 furnace. These processes are controlled by a cyclonic separator and venturi scrubber known as the No. 8 THFC.

Table 19.1 describes the devices used to control emissions from Emissions Point 18 emissions sources.

Table 19.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
570.00	FeP slag tapping ¹	No. 8 THFC
571.00	CaSi slag tapping ²	No. 8 THFC
580.10	No. 8 treater dust burning chamber	No. 8 THFC

¹ Ferrophosphorus

² Calcium Silicate

Table 19.2 contains a summary of the requirements that apply to the sources controlled by the No. 8 THFC. Specific permit requirements are listed below Table 19.2.

Table 19.2 NO. 8 TAP HOLE FUME COLLECTOR APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
19.1	Particulate matter	0.2 lb/T of material fed to furnace, Process weight	Operating Permit No. 13-0420-0001-08; IDAPA 58.01.01.702	19.3, 19.4, 19.5, 19.6, 19.7
19.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8

Permit Limits/Standards Summary

- 19.1 The PM emissions from the No. 8 THFC venturi stack shall not exceed 0.2 lb/T of material fed to the furnace.
[Operating Permit No. 13-0420-0001-08, 7/18/79; IDAPA 58.01.01.702, 4/5/00]
- 19.2 Visible emissions from the No. 8 THFC stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 18, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
[IDAPA 58.01.01.625, 4/5/00]

Operating Requirements

- 19.3 The permittee shall conduct a PM compliance test on the No. 8 THFC prior to December 31, 2003, in accordance with the procedures outlined in 40 CFR Part 60, Appendix A, Method 5, or a Department-approved alternative.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

If the PM emission rate measured in the compliance test is less than or equal to 75% of the emission standard in Permit Condition 19.1, no further testing shall be required during this permit term. If the PM emission rate measured during the compliance test is greater than 75%, but less than or equal to 90% of the emission standard in Permit Condition 19.1, a second test shall be required in the third year of the permit term. If the PM emission rate measured during the compliance test is greater than 90% of the emission standard in Permit Condition 19.1, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.09, 5/1/94]

- 19.4 The permittee shall install equipment to measure, or develop methods to determine, the pounds per hour of material handled throughout the process.

[IDAPA 58.01.01.322.06, 5/1/94]

- 19.5 The scrubber shall be operated so that the pressure drop across the scrubber and scrubber fluid flow rate are maintained at or above 80% of the pressure drop and solution flow rate recorded during the Department-approved compliance test. Deviations from the allowable operating range may not by themselves be considered deviations from applicable emissions standards (i.e., Permit Condition 19.1), unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required.

[IDAPA 58.01.01.322.01, 5/1/94]

Monitoring and Recordkeeping Requirements

- 19.6 Each week, the permittee shall monitor and record the pressure drop across the scrubber, fan current, and fluid flow rate to the scrubber.

[IDAPA 58.01.01.322.06, 5/1/94]

- 19.7 The permittee shall maintain records containing the following:

- 19.7.1 The daily average hourly process weight rate.

- 19.7.2 The daily average calculated hourly emission limitation using the 0.2 lb/T emission limit if the process weight rate is less than 352,000 lb/hr. If the process weight rate is greater than 352,000 lb/hr, the permittee shall calculate the maximum hourly emission limitation using the formula in Permit Condition 19.1.

- 19.7.3 These records shall be maintained in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

20. EMISSIONS POINT 19 - No. 9 Tap Hole Fume Collector**Summary Description**

The following requirements apply generally to emissions from slag-tapping and electrostatic precipitator dust oxidation from the No. 9 furnace. These processes are controlled by a cyclonic separator and venturi scrubber known as the No. 9 THFC. The No. 9 THFC also controls emissions from the seal pots (see section 21).

Table 20.1 describes the devices used to control emissions from Emissions Point 19 emissions sources.

Table 20.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
594.00	FeP slag tapping ¹	No. 9 THFC
595.00	CaSi slag tapping ²	No. 9 THFC
604.10	No. 9 treater dust burning chamber	No. 9 THFC

¹ Ferrophosphorus

² Calcium Silicate

Table 20.2 contains a summary of the requirements that apply to the sources controlled by the No. 9 THFC. Specific permit requirements are listed below Table 20.2.

Table 20.2 NO. 9 TAP HOLE FUME COLLECTOR APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
20.1	Particulate matter	0.2 lb/T of material fed to furnace, Process weight	Operating Permit No. 0420-0001-009; IDAPA 58.01.01.702	20.3, 20.4, 20.5, 20.6, 20.7
20.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8

Permit Limits/Standards Summary

- 20.1 The PM emissions from the No. 9 THFC venturi stack shall not exceed 0.2 lb/T of material fed to the furnace.
[Operating Permit No. 13-0420-0001-09, 7/18/79; IDAPA 58.01.01.702, 4/5/00]
- 20.2 Visible emissions from the No. 9 THFC stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 19, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
[IDAPA 58.01.01.625, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002

Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Operating Requirements

- 20.3 The permittee shall conduct a PM compliance test on the No. 9 THFC prior to December 31, 2003, in accordance with the procedures outlined in 40 CFR Part 60, Appendix A, Method 5 or a Department-approved alternative method.

If the PM emission rate measured in the compliance test is less than or equal to 75% of the emission standard in Permit Condition 20.1, no further testing shall be required during this permit term. If the PM emission rate measured during the compliance test is greater than 75%, but less than or equal to 90% of the emission standard in Permit Condition 20.1, a second test shall be required in the third year of the permit term. If the PM emission rate measured during the compliance test is greater than 90% of the emission standard in Permit Condition 20.1, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.09, 5/1/94]

- 20.4 The permittee shall install equipment to measure, or develop methods to determine, the pounds per hour of material handled throughout the process.

[IDAPA 58.01.01.322.06, 5/1/94]

- 20.5 The scrubber shall be operated so that the pressure drop across the scrubber and scrubber fluid flow rate are maintained at or above 80% of the pressure drop and solution flow rate recorded during the Department-approved compliance test. Deviations from the allowable operating range may not by themselves be considered deviations from applicable emissions standards (i.e., Permit Condition 20.1), unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required.

[IDAPA 58.01.01.322.01, 5/1/94]

Monitoring and Recordkeeping Requirements

- 20.6 Once each week, the permittee shall monitor and record the pressure drop across the scrubber, fan current, and fluid flow rate to the scrubber.

[IDAPA 58.01.01.322.06, 5/1/94]

- 20.7 The permittee shall maintain records containing the following:

20.7.1 The daily average hourly process weight rate.

20.7.2 The daily average calculated hourly emission limitation using the 0.2 lb/T emission limit if the process weight rate is less than 352,000 lb/hr. If the process weight rate is greater than 352,000 lb/hr, the permittee shall calculate the maximum hourly emission limitation using the formula in Permit Condition 20.1.

20.7.3 These records shall be maintained in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC **Project No.:** T1-9508-127-1 **Date Issued:** December 30, 2002
Location: Soda Springs, Idaho **Date Expires:** December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

21. EMISSIONS POINT 20 - Phosphorus Storage**Summary Description**

The following requirements apply generally to phosphorus storage and loading operations.

Table 21.1 describes the devices used to control emissions from Emissions Point 20 emissions sources.

Table 21.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
707.00	Acid water tank seal pot	No. 9 THFC with No. 7 THFC backup
710.10	Wastewater tank seal pot	No. 9 THFC with No. 7 THFC backup
712.00	East mud tank seal pot	No. 9 THFC with No. 7 THFC backup
713.00	West mud tank seal pot	No. 9 THFC with No. 7 THFC backup
714.00	CO phos trap seal pot	Vented to atmosphere
715.00	554/508 mud tank seal pot	No. 9 THFC with No. 7 THFC backup
717.00	Phosphorus loading leg	Vented to atmosphere
717.10	Phosphorus loading sump	Vented to atmosphere

Table 21.2 contains a summary of the requirements that apply to phosphorus storage. Specific permit requirements are listed below Table 21.2.

Table 21.2 PHOSPHORUS STORAGE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
21.1	Visible emissions	40% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625.02	21.2

Permit Limits/Standards Summary

- 21.1 A person shall not discharge to the atmosphere from any point of emission, any air pollutant for a period or periods aggregating more than three minutes in any 60-minute period that is greater than 40% opacity as determined by this permit condition.

[IDAPA 58.01.01.625.02, 4/23/99]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Monitoring and Recordkeeping Requirements

- 21.2 The permittee shall conduct a visible emission inspection of the CO phosphorus-trap seal pot, phosphorus loading leg, and phosphorus-loading sump once each week during daylight hours and under normal operating conditions. If opacity greater than 20% is present, the permittee shall take appropriate corrective action as expeditiously as practicable. If opacity is greater than 40% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each weekly visible emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.
- [IDAPA 58.01.01.322.06, 07, 08, 5/1/94]
- 21.3 The seal pots, except the CO phosphorus trap seal pot, are controlled by the tap hole fume collectors. The opacity limit from the tap hole fume collectors is 20% and they have their own visible emissions monitoring requirements so specific monitoring and recordkeeping to demonstrate compliance with 40% opacity standard for this process is not required.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

22. EMISSIONS POINT 21 - No. 7 and No. 8 CO Flare**Summary Description**

The following requirements apply generally to emissions from furnace No. 7 and furnace No. 8. Each furnace has an electrostatic precipitator (treater) and spray tower to control particulate emissions before the furnaces are ducted together and excess CO is burned at one flare, the No. 7 and No. 8 CO flare. The CO is either burned at the flare or ducted to the kiln to be used as fuel.

Table 22.1 describes the devices used to control emissions from Emissions Point 21 emissions sources.

Table 22.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
560.00	No. 7 furnace CO to No. 7 and No. 8 flare	Electrostatic precipitator, spray tower, No. 7 and No. 8 flare
560.10	No. 7 furnace CO to No. 7 emergency CO flare stack	Electrostatic precipitator, spray tower, No. 7 emergency flare
584.00	No. 8 furnace CO to No. 7 and No. 8 flare	Electrostatic precipitator, spray tower, No. 7 and No. 8 flare
584.10	No. 8 furnace CO to No. 8 emergency CO flare stack	Electrostatic precipitator, spray tower, No. 8 emergency flare

Table 22.2 contains a summary of the requirements that apply to the No. 7 and No. 8 furnaces. Specific permit requirements are listed below Table 22.2.

Table 22.2 NO. 7 AND NO. 8 CO FLARE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping
22.1	Particulate matter	0.2 pounds per one hundred pounds refuse burned	IDAPA 58.01.01.786	22.4, 22.5
22.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	22.3, 22.5, 22.6

Permit Limits/Standards Summary

- 22.1 No person shall allow, suffer, cause, or permit any incinerator to discharge more than 0.2 pounds of particulate per 100 pounds of refuse burned. For the purposes of Permit Condition 21, emissions shall be averaged according to the following, whichever is the lesser period of time:
- 22.1.1 One complete cycle of operation.
- 22.1.2 One hour of operation representing worst-case conditions (design throughput rate) for the emissions of PM.
- [IDAPA 58.01.01.786.01, 02, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 22.2 Visible emissions from the No. 7 and No. 8 CO flare, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 21, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

Monitoring and Recordkeeping Requirements

- 22.3 The permittee shall conduct an opacity test once each week, using the method contained in IDAPA 58.01.01.625.04, during daylight hours and under normal operating conditions. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each opacity test.

[IDAPA 58.01.01.322.06, .09, 5/1/94]

- 22.4 Once each week the permittee shall monitor and record the following:

- 22.4.1 The voltage and amperage to No. 7 and No. 8 electrostatic precipitators.
- 22.4.2 Fluid flow rates through the spray towers.
- 22.4.3 Spray tower off-gas temperature.

[IDAPA 58.01.01.322.06, 5/1/94]

- 22.5 Once each month, the permittee shall calculate the average pounds per hour of refuse burned in the flares (total CO to the No. 7 and 8 flare and No. 9 flare).

[IDAPA 58.01.01.322.06, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001**Permittee:** P₄ Production, LLC
Location: Soda Springs, Idaho**Project No.:** T1-9508-127-1**Date Issued:** December 30, 2002**Date Expires:** December 30, 2006*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***23. EMISSIONS POINT 22 - No. 9 CO Flare****Summary Description**

The following requirements apply generally emissions from furnace No. 9. The furnace has an electrostatic precipitator (treater) and spray tower to control particulate emissions before the CO is burned at the flare or ducted to the kiln.

Table 23.1 describes the devices used to control emissions from Emissions Point 22 emissions sources.

Table 23.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
608.00	No. 9 CO to No. 9 flare	Electrostatic precipitator, spray tower, No. 9 flare

Table 23.2 contains a summary of the requirements that apply to the No. 9 furnace. Specific permit requirements are listed below Table 23.2.

Table 23.2 NO. 9 CO FLARE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
23.1	Particulate matter	0.2 lb per hundred pounds burned	IDAPA 58.01.01.786	23.4, 23.5, 23.6, 23.7
23.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	23.3

Permit Limits/Standards Summary

- 23.1 No person shall allow, suffer, cause, or permit any incinerator to discharge more than 0.2 pounds of particulate per 100 pounds of refuse burned. Emissions shall be averaged according to the following, whichever is the lesser period of time:
- 23.1.1 One complete cycle of operation.
- 23.1.2 One hour of operation representing worst-case conditions (design throughput rate) for the emissions of PM.
[IDAPA 58.01.01.786.02, 4/5/00]
- 23.2 Visible emissions from the No. 9 CO flare, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 22, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
[IDAPA 58.01.01.625, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee:	P ₄ Production, LLC	Project No.:	T1-9508-127-1	Date Issued:	December 30, 2002
Location:	Soda Springs, Idaho			Date Expires:	December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Monitoring and Recordkeeping Requirements

- 23.3 The permittee shall conduct an opacity test once each week, unless the flare was not used during the week, using the method contained in IDAPA 58.01.01.625.04, during daylight hours and under normal operating conditions. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each opacity test.

[IDAPA 58.01.01.322.06, .09, 5/1/94]

- 23.4 Once each week the permittee shall monitor and record the following:

23.4.1 The voltage and amperage to the No. 9 electrostatic precipitator.

23.4.2 Spray tower off-gas temperature.

23.4.3 Fluid flow rates through the spray tower.

[IDAPA 58.01.01.322.06, 5/1/94]

- 23.5 Once each month, the permittee shall:

23.5.1 Monitor and record the average hourly CO flow, in pounds per hour, to the kiln.

23.5.2 Calculate and record the average pound-per-hour CO flow to the flares (total CO to the No. 7 and 8 flare and No. 9 flare).

[IDAPA 58.01.01.322.06, 5/1/94]

- 23.6 Once each shift, the permittee shall monitor and record the operation of the phosphorus traps and operation of the CO flow monitor to the kiln.

[IDAPA 58.01.01.322.06, 5/1/94]

- 23.7 Once each year, the permittee shall complete a thickness profile of the CO piping to the kiln.

[IDAPA 58.01.01.322.06, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001**Permittee:** P₄ Production, LLC**Project No.:** T1-9508-127-1**Date Issued:** December 30, 2002**Location:** Soda Springs, Idaho**Date Expires:** December 30, 2006*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***24. EMISSIONS POINT 23 - Natural Gas-Fired Boiler (A/U Boiler)****Summary Description**

The following requirements apply generally to the natural gas-fired boiler (A/U boiler).

Table 24.1 describes the devices used to control emissions from Emissions Point 23 emissions sources.

Table 24.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
804.00	Natural gas-fired	None

Table 24.2 contains a summary of the requirements that apply to the A/U boiler. Specific permit requirements are listed below Table 24.2.

Table 24.2 NATURAL GAS-FIRED BOILER (A/U BOILER) APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
24.1	PM	Gas - 0.015 gr/dscf, 3% oxygen Liquid - 0.050 gr/dscf, 3% oxygen	IDAPA 58.01.01.677	24.3
24.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, 4/5/00	1.8

Permit Limits/Standards Summary

- 24.1 The PM emissions shall not exceed 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for natural gas, and 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid fuel.
[IDAPA 58.01.01.677, 5/1/94]
- 24.2 Visible emissions from the A/U boiler stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Unit 23, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
[IDAPA 58.01.01.625, 4/5/00]

Operating Requirements

- 24.3 The boiler shall burn only natural gas. No monitoring or recordkeeping of grain-loading is required by this permit while burning natural gas.
[IDAPA 58.01.01.322.06, 5/1/94]

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Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

25. COMPLIANCE SCHEDULE

P₄ Production is not in compliance at the time of issuance of the Tier I operating permit with the applicable PTC requirements for sources listed in Permit Condition 25.1. To bring the facility into compliance with the applicable requirements in the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.01, et seq., the permittee shall obtain a combined facility-wide Tier II operating permit and PTC (hereafter referred to as the facility-wide permit) and a modified Tier I operating permit. The specific elements of the compliance schedule are summarized in Table 25.1 and specified in Permit Conditions 25.2 through 25.9.

TABLE 25.1. COMPLIANCE SCHEDULE

PERMIT CONDITIONS	MILESTONE	DEADLINE	DOCUMENTATION / REPORTING
25.2	Submit complete facility-wide permit application to comply with IDAPA 58.01.01.400 through 410	180 days after issuance of the Tier I operating permit	Completeness letter from the Department
25.3	Concurrently submit complete application information to address the applicable PTC requirements in IDAPA 58.01.01.200 through 223 for those sources for which the permittee was required to, but did not obtain, a PTC	180 days after issuance of the Tier I operating permit	Completeness letter from the Department
25.4	Submit supplemental application information to address the applicable PTC requirements for any additional sources identified	Within 30 days of a request in writing by the Department during processing of the facility-wide permit	Completeness letter from the Department
25.7	Submit a request to modify the Tier I operating permit	30 days after the facility-wide permit application is found complete	Completeness letter from the Department
25.8	Submit quarterly progress reports	January 1, April 1, July 1, and October 1 of each year	

25.1 The Department identified the following sources as sources that are not in compliance because of failure to obtain a permit to construct prior to construction or modification:

- No. 7 furnace hearth replacement (1994)
- No. 7 furnace transformer replacement (1989)

The permittee has the continuing responsibility to submit any supplementary information needed, including information for any other sources, in accordance with IDAPA 58.01.01.315.

25.2 P₄ Production shall submit a complete permit application and all additional information requested by the Department for issuance of a facility-wide Tier II operating permit within 180 days of issuance of this Tier I operating permit. The application shall address the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410.

[IDAPA 58.01.01.322.10, 4/5/00]

25.3 In addition to the requirements for Tier II operating permits, the facility-wide permit application shall include all of the applicable information and address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through IDAPA 58.01.01.223 and the NSPS requirements in 40 CFR 60, Subpart KB for the construction and/or modification of sources for which the permittee was required to, but did not obtain, a PTC.

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The Department has identified the sources listed in Permit Condition 25.1 as sources that failed to obtain a permit prior to construction or modification.

[IDAPA 58.01.01.322.10, 4/5/00]

- 25.4 If through the development of the facility-wide permit, it is determined that the facility should have obtained a PTC or a PTC modification for any other source or sources at the facility, the permittee shall submit a supplemental application that addresses the applicable requirements for PTCs within 30 days of receiving written notification from the Department.

[IDAPA 58.01.01.322.10, 4/5/00]

- 25.5 The application submittal deadlines set forth in the compliance schedule may be extended if the permittee clearly demonstrates that additional time is needed to collect new data for submittal of a complete application. Extension requests, with complete information to justify the request, must be submitted in writing to the Department no later than the midpoint of the milestone timeline. The deadlines may be extended for up to one year through written authorization from the Department.

[IDAPA 58.01.01.322.10, 4/5/00]

- 25.6 Upon receipt of a complete application, the Department will draft a single proposed facility-wide permit for the facility. The permit will contain all of the terms and conditions necessary to comply with the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 and the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410. The permit will clearly identify the origin and basis for each term and condition. The procedures for issuing a PTC under IDAPA 58.01.01.209 shall be followed concurrently with the procedures for issuing a Tier II operating permit under IDAPA 58.01.01.404.

[IDAPA 58.01.01.322.10, 4/5/00]

- 25.7 P₄ Production shall request a modification to their Tier I operating permit within 30 days after the combined facility-wide Tier II operating permit and PTC application is determined complete by the Department. The Tier I operating permit shall be modified to incorporate all applicable requirements of the facility-wide permit and shall be issued concurrently with the facility-wide permit in accordance with the procedures for issuing a Tier I permit in IDAPA 58.01.01.360 through 369.

[IDAPA 58.01.01.322.10, 4/5/00]

- 25.8 Until such time that a modified Tier I operating permit is issued pursuant to Permit Condition 25.7 P₄ Production shall submit a progress report each calendar quarter to the Department stating when each of the milestones and compliance with each condition in the compliance schedule were or will be achieved, and an explanation of why any dates were not or will not be met and a detailed description of any preventative or corrective measures undertaken by the permittee.

[IDAPA 58.01.01.322.10, 4/5/00]

- 25.9 This schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.

[IDAPA 58.01.01.322.10, 4/5/00]

- 25.10 P₄ Production is not in compliance at the time of issuance of the Tier I operating permit with the applicable visible emission and particulate matter requirements for sources listed in Permit Condition 25.10. To bring the facility into compliance with the applicable requirements in the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.01, et seq., the permittee shall comply with the compliance schedule in Permit Condition 25.10.

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

No. 7 and No. 8 CO Flare Opacity and Particulate Compliance Schedule

The permittee shall demonstrate compliance with the applicable opacity and particulate matter standards for the No. 7 and No. 8 CO flares in accordance with the schedule for applying BACT for PM₁₀ as contained in the consent order issued on the same date as this Tier I operating permit.

[IDAPA 58.01.01.322.10.a.i, 4/5/00]

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26. INSIGNIFICANT ACTIVITIES

Activities and emissions units identified as insignificant under IDAPA 58.01.01.317.01(b) are required to be listed in the Tier I operating permit to qualify for a permit shield.

Table 26.1 INSIGNIFICANT ACTIVITIES

Location of the Emissions unit At the facility	Description	Emission Point	Insignificant activities IDAPA citation Section 317.01(b)
303.00, Hydroclarifier	Sodium hydrosulfide unloading	Fug, lime slaker building	b19, Aqueous solution of an inorganic salt
304.00, Underflow solids	Sodium hydrosulfide addition	Fug, belt filter building	b19, Aqueous solution of an inorganic salt
318.00, Kiln	Diesel tanks (auxiliary)	Fug, outside	b3, Diesel storage tanks, 250 gallons each
560.15, Furnace No. 7	Flare stack igniter	Pt, No. 7 & No. 8 co Flare stack	b5, Natural gas, 0.15 MMBtu/hr ¹
560.50, Furnace No. 7	No. 7 hearth fan gasoline fuel tank	Fug, inside building	b3, Gasoline storage tank, 25 gallons
560.55, Furnace No. 7	No. 7 hearth fan fuel backup motor (Gasoline driven)	Pt, inside building	b6, Gasoline, 65 hp = 0.165 MMBtu/hr
560.60, Furnace No. 7	Gasoline tank (shell motor pump – No. 7&8)	Fug, inside building	b3, Gasoline storage tank, 40 gallons
560.65, Furnace No. 7	Shell motor pump No. 7&8 (Gasoline driven)	Pt, outside building	b6, Gasoline, 192 hp = 0.488 MMBtu/hr
584.50, Furnace No. 8	No. 8 hearth fan diesel fuel tank	Fug, inside building	b3, Diesel storage tank, 200 gallons
584.55, Furnace No. 8	No. 8 hearth fan fuel electrical backup motor (Diesel driven)	Pt, inside building	b7, Gasoline, 65 hp = 0.165 MMBtu/hr
608.15, Furnace No. 9	Flare stack igniter	Pt, No. 9 Co flare	b5, Natural gas, 0.15 MMBtu/hr
608.50, Furnace No. 9	No. 9 hearth fan diesel fuel tank	Fug, inside building	b3, Diesel storage tank, 58 gallons
608.55, Furnace No. 9	No. 9 hearth fan fuel electric backup motor (diesel driven)	Pt, inside building	b7, Diesel, 192 hp = 0.488 MMBtu/hr
608.80, Furnace No. 9	Diesel tank (No. 9 oil seal fire system)	Fug, inside building	b3, Diesel storage tank, 200 gallons

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Location of the Emissions unit At the facility	Description	Emission Point	Insignificant activities IDAPA citation Section 317.01(b)
608.85, Furnace No. 9	No. 9 oil seal fire system pump (Diesel driven)	Fug, inside building	b7, Diesel (No. 2 fuel oil) 0.51 MMBtu/hr
608.90, Furnace No. 9	Gasoline tank (No. 9 furnace shell motor pump)	Fug, outside	b3, Gasoline storage tank, 25 gallons
608.95, Furnace No. 9	No. 9 furnace shell pump motor (Gasoline driven)	Pt, inside building	b6, Gasoline, 192 hp = 0.488 MMBtu/hr
805.10, Boiler house	Diesel tank	Fugitives, inside building	b3, Diesel storage tank, 50 gallons
805.20, Boiler house	Emergency diesel electric engine	Pt, wall vent	b7, Diesel (No. 2 fuel oil) 0.51 MMBtu/hr
807.00, Machine shop	Gas heaters (2)	Pt, roof vents	b5, b18, Natural gas, 0.030 MMBtu/hr each
812.00, Tank car repair building	Gas heaters (2)	Pt, roof vents	b5, b18, Natural gas, 0.16 MMBtu/hr each
814.00, Training building	Gas Furnace	Pt, roof vent	b5, 18, Natural gas, 0.125 MMBtu/hr
817.00, South shop	Gas heaters (2)	Pt, roof vents	b5, b18, Natural gas, 0.16 MMBtu/hr each
819.00, North shop	Gas heaters (3)	Pt, roof vents	b5, b18, Natural gas, 0.14 MMBtu/hr each
821.00, North shop	Jet washer	Fug, inside building	b26, Electric washer using hot water
822.00, Electric shop	Gas heaters (3)	Pt, roof vents	b5, b18, Natural gas, 0.10 MMBtu/hr each
823.00, Electric shop	Jet washer	Fug, inside building	b26, Electric washer using hot water
827.00, sandblasting area	Propane storage tank	Fug, outside	b4, Propane storage tank, 500 gallons
829.00, salvage hill	Kerosene tank	Fug, outside	b3, Kerosene storage tank, 250 gallons
829.10, salvage hill	Propane heaters (10)(10)(20)(12)	Fug, inside building	b5, 18, Propane, (10) 0.15 MMBtu/hr each, (10) 0.08 MMBtu/hr each, (20) 0.09 MMBtu/hr each, (12) 0.40 MMBtu/hr each
830.00, salvage hill	Stoddard solvent tank	Fug, outside	b3, Stoddard solvent storage tank, 500 gallons

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Location of the Emissions unit At the facility	Description	Emission Point	Insignificant activities IDAPA citation Section 317.01(b)
832.00, Maintenance building	Welding	Fug, inside	b9, Small amount of Welding rod used per day (<<1 ton/day)
833.00, Maintenance building	Propane heaters (10)(10)(20)(12)	Pt, roof vents	b5, 18, Propane, 0.03 MMBtu/hr
835.00, Heavy duty building	Steam parts cleaner	Fug, inside	b26, Cleaning equipment using Steam
838.00, Heavy duty building	Jet washer	Fug, inside	b26, Electric washer using hot water
841.00, Heavy duty building	Gas heaters (13)(1)	Pt, roof vents	b5, 18, Natural gas, (13) 0.20 MMBtu/hr each, (1) 0.032 MMBtu/hr
843.00, Mark III shop	Welding	Fug, inside	b9, Small amount of Welding rod used per day (<<1 ton/day)
844.00, Mark III shop	Gas heaters (3)	Pt, roof vents	b5, 18, Natural gas, 0.20 MMBtu/hr each
845.00, Mark III shop	Jet washer	Fug, inside	b26, Electric washer using hot water
846.00, materials handling shop	Gas furnace (2)	Pt, roof vent	b5, 18, Natural gas (1) 0.20 MMBtu/hr, (1) 0.10 MMBtu/hr
848.10, Fuel storage tank	Low sulfur diesel tank	Fug, outside	b3, Diesel storage tank, 500 gallons
849.00, Fuel storage tank	Gasoline storage tanks (3)	Fug, outside	b3, Gasoline storage tanks, 1200 gallons each
852.00, Main control lab	Auto fluxer (glass beading Machine)	Pt, roof vent	b5, Natural gas, 0.30 MMBtu/hr
853.00, Main control lab	Ambient air pre-heater	Pt, roof vent	b5, 18, Natural gas, 0.20 MMBtu/hr each
855.30, Main control lab	Oil filter bath tank	Fug, outside	b3, low volatility oil tank, 15 gallons
856.00, Pump repair shop	Water heater	Pt, roof vent	b5, 18, Natural gas, 0.178 MMBtu/hr
918.10, Phossey water ponds	Sulfuric acid dispensing	Fug, acid addition building	b19, 97% h ₂ so ₄

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Location of the Emissions unit At the facility	Description	Emission Point	Insignificant activities IDAPA citation Section 317.01(b)
927.20, Slag handling	Coating mixing tank	Pt, exhaust vent	b26, Slurry tank, 400 gallons
927.30, Slag handling	High moisture coating station	Fug, outside	b25, Surface coating using aqueous mixture
961.00, Pump repair shop	Jet washer	Pt, wall duct	b26, Electric washer using hot water
962.00, Inert Gas generator	Generator fugitives	Fug, outside	b5, Natural gas, 0.50 MMBtu/hr
965.00, Sub-station	Transformer oil tank	Fug, outside	b3, Oil storage tank, 2,060 gallons
966.10, Plant well 1-4	Backup diesel pumps	Pt, outside	b7, Diesel, 192 hp = 0.488 MMBtu/hr
1025.00, Portable welders	Exhaust	Mobile, tailpipe	b7, Diesel (No. 2 fuel) 150 hp = 0.38 MMBtu/hr
1025.10, Portable equipment	Portable propane tanks (4)	Fug, outside	b4, Propane storage tanks, (2) 172 gal, (2) 176 gal
317.00, Kiln	Treater oil carts	Fug, inside/outside	b30, No significant phosphine or P205 emissions
553.00, Furnace No. 7	Seal oil emissions	Pt, No. 7 Seal oil vent stack	b30, No significant phosphine or P205 emissions
557.00	No. 7 Treater heat vent	Pt, outside	b30, Natural gas-fired
558.00, Furnace No. 7	Seal oil to cart	Fug, outside	b30, No significant phosphine or P205 emissions
560.40, Furnace No. 7	Treater oil carts	Fug, outside	b30, No significant phosphine or P205 emissions
577.00, Furnace No. 8	Seal oil emissions	Pt, No. 8 Seal oil vent stack	b30, No significant phosphine or P205 emissions
581.00	No. 8 Treater heat vent	Pt, outside	b30, Natural gas-fired
582.00, Furnace No. 8	Seal oil to cart	Fug, outside	b30, No significant phosphine or P205 emissions
584.40, Furnace No. 8	Treater oil carts	Fug, outside	b30, No significant phosphine or P205 emissions
601.00, Furnace No. 9	Seal oil emissions	Pt, No. 9 east Seal oil vent stack	b30, No significant phosphine or P205 emissions
601.10, Furnace No. 9	Seal oil emissions	Pt, No. 9 west Seal oil vent stack	b30, No significant phosphine or P205 emissions
605.00	No. 9 Treater heat vent	Pt, outside	b30, Natural gas-fired

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Location of the Emissions unit At the facility	Description	Emission Point	Insignificant activities IDAPA citation Section 317.01(b)
606.00, Furnace No. 9	Seal oil to cart	Fug, outside	b30, No significant phosphine or P205 emissions
608.40, Furnace No. 9	Treater oil carts	Fug, outside	b30, No significant phosphine or P205 emissions
711.10, Phosphorus storage	Railcar cleanout leg	Fug, outside	b30, No significant emissions
720.10, Phosphorus storage	Phosphorus RR tank cars	Pt, outside	b30, Unloading is a closed Loop system, no emissions should occur
720.20, Phosphorus storage	Phosphorus ISO tanks	Pt, outside	b30, Unloading is a closed loop system, no emissions should occur
801.00, Store room	Starting fluid, spot check	Fug, inside	b30, Minor emissions
803.00, Store room	Solvent storage cabinet	Fug, inside	b30, Stored Sealed, solvent use accounted for elsewhere
806.00, Machine shop	Welding snorkle vents	Pt, duct vent	b30, Primarily Welding emissions (insignificant activity)
808.10, Machine shop	Flammable storage cabinet	Fug, inside building	b30, Stored Sealed, solvent use accounted for elsewhere
809.00, Tank car repair building	Welding snorkle vents	Pt, duct vent	b30, Primarily Welding emissions (insignificant activity)
810.00, Tank car repair building	Plasma cutter	Fug, inside building	b30, Low usage, negligible amount of emissions
811.00, Tank car repair building	Acetylene cutter	Fug, inside	b30, Low usage, negligible amount of emissions
815.00, South shop	Welding snorkle vents	Pt, duct vent	b30, Primarily Welding emissions (insignificant activity)
816.00, South shop	Forge	Pt, roof vent	b30, Low usage, negligible amount of emissions
820.00, North shop	Welding snorkle vents	Pt, duct vent	b30, Primarily Welding emissions (insignificant activity)
826.10, Sandblasting area	plasma cutter	Fug, outside	b30, Low usage, negligible amount of emissions

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Location of the Emissions unit At the facility	Description	Emission Point	Insignificant activities IDAPA citation Section 317.01(b)
840.00, Heavy duty building	Welding snorkle vents	Pt, duct vent	b30, Primarily Welding emissions (insignificant activity)
843.10, Mark III shop	Welding snorkle vents	Pt, wall vent	b30, Primarily Welding emissions (insignificant activity)
102.00, 109.00, 116.00, 121.00, 523.00, 523.20, 530.20, 610.00, 855.20	Baghouse dust unloading	Vactor truck vent	b30, Bag in vactor truck is process equipment
303.20	Lime silo loading	Pt, Lime silo baghouse vent	IDAPA 58.01.01.317.01.a.i (95)

¹ million British thermal units per hour

- 26.1 There are no additional monitoring, recordkeeping, or reporting requirements for insignificant emissions units or activities beyond those required in the Facility-wide Permit Conditions.

[IDAPA 58.01.01.322.06, 5/1/94]

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27. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

- 27.1 The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
- 27.2 It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
- 27.3 Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

- 27.4 This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(iii)]
- 27.5 The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

- 27.6 This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

- 27.7 The permittee shall furnish all information requested by the Department, within a reasonable time, the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
[Idaho Code §39-108; IDAPA 58.01.01.122, 5/1/94; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]
- 27.8 Upon request, the permittee shall furnish to the Department copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.
[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

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Severability

- 27.9 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

- 27.10 The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i; 380-386, 3/19/99; 40 CFR 70.4(b)(12), (14) and (15), and 70.7(d) and (e)]

- 27.11 Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 USC Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 USC Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/1/94; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

- 27.12 Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by the Department in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]

- 27.13 Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

Inspection and Entry

- 27.14 Upon presentation of credentials, the permittee shall allow the Department or an authorized representative of the Department to do the following:

- 27.14.1 Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;

- 27.14.2 Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

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- 27.14.3 Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- 27.14.4 As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

- 27.15 The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94;
40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

- 27.16 The owner or operator of a Tier I source shall pay annual registration fees to the Department in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.

[IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]

Certification

- 27.17 All documents submitted to the Department shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

- 27.18 The owner or operator of a Tier I source shall submit an application to the Department for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

- a. If a timely and complete application for a Tier I operating permit renewal is submitted, but the Department fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

- 27.19 Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or:

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- i. The Department has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- c. Nothing in this permit shall alter or affect the following:
 - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of the Department to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 322.15.m, 325, 5/1/94;
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- 27.20
- a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
 - b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
 - c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
 - d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 10, 5/1/94; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

- 27.21
- The permittee shall submit compliance certifications during the term of the permit for each emissions unit to the Department and the EPA as follows:
- a. Compliance certifications for all emissions units shall be submitted annually beginning twelve (12) months from the permit issuance date, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by the Department;
 - b. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;

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- c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
- i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
 - iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 27.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
 - iv. Such other facts as the Department may require to determine the compliance status of the source.
- d. All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]

False Statements

- 27.22 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

- 27.23 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

- 27.24 In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months starting January 1, or June 1, whichever date comes first. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

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Reporting Deviations and Excess Emissions

- 27.25 The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

- 27.26 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.
[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

- 27.27 In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.
[IDAPA 58.01.01.332.01, 3/19/99; 40 CFR 70.6(g)]

Operation and Maintenance Procedures

- 27.28 The Director may require the permittee to develop a list of operation and maintenance procedures (Appendix B) that must be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
[Operating Permit No. 13-0420-0001-00, General Provision H, 7/18/79]

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APPENDIX A

Visible Emissions Frequency

Emission Point	Frequency	Evaluation
Kiln Hydro-Sonic® scrubbers (1-4)	Weekly	See/No See (1.8)
Nodule Cooler Spray Tower	Weekly	See/No See (1.8)
Dryer Baghouse 836	Weekly	See/No See (1.8)
Baghouse 104	Weekly	See/No See (1.8)
Baghouse 105	Weekly	See/No See (1.8)
Coke Bunker Baghouse	Weekly	See/No See (1.8)
Coke-Handling Baghouse	Weekly	See/No See (1.8)
Bulk Storage Bin Baghouse	Weekly	See/No See (1.8)
#304 Coke Fines Bin Vent	Weekly	See/No See (1.8)
#305 Coke Fines Bin Vent	Weekly	See/No See (1.8)
#306 Coke Fines Bin Vent	Weekly	See/No See (1.8)
#307 Coke Fines Bin Vent	Weekly	See/No See (1.8)
#308 Coke Fines Bin Vent	Weekly	See/No See (1.8)
#309 Coke Fines Bin Vent	Weekly	See/No See (1.8)
Scaleroom Baghouse	Weekly	See/No See (1.8)
No. 7 CO Baghouse	Weekly	See/No See (1.8)
No. 8 CO Baghouse	Weekly	See/No See (1.8)
No. 9 CO Baghouse	Weekly	See/No See (1.8)
Main Stocking System Baghouse	Weekly	See/No See (1.8)
Nodule Reclaim Baghouse	Weekly	See/No See (1.8)
SDM Bin Vent	Weekly	See/No See (1.8)
Nodule Crushing and Screening Scrubber	Weekly	See/No See (1.8)
No. 7 Tap Hole Fume Collector	Weekly	See/No See (1.8)
No. 8 Tap Hole Fume Collector	Weekly	See/No See (1.8)
No. 9 Tap Hole Fume Collector	Weekly	See/No See (1.8)
No. 7 and No. 8 CO Flare	Weekly	Opacity (1.15)
No. 9 CO Flare	Weekly	Opacity (1.15)
A/U Boiler	None	Fired on natural gas
Vactor Truck Vent ¹	Monthly	See/No See (1.8)
#7 CO Dust Bypass Stack	See Footnote 2	
#7 Vent Stack	See Footnote 2	
#7 Emergency CO Flare Stack	See Footnote 2	
#8 CO Dust Bypass Stack	See Footnote 2	
#8 Vent Stack	See Footnote 2	
#8 Emergency CO Flare Stack	See Footnote 2	
#9 CO Dust Bypass Stack	See Footnote 2	
#9 Vent Stack	See Footnote 2	
#7 Explosion Seal Vent	See Footnote 2	
#8 Explosion Seal Vent	See Footnote 2	
#9 Explosion Seal Vent	See Footnote 2	
#7 Phos Explosion Seal	None	Controlled by THFC system
#7 Tank Seal Pot Vent	None	Controlled by THFC system
#8 Tank Explosion Seal	None	Controlled by THFC system
#8 Tank Seal Pot	None	Controlled by THFC system
Explosion Seals	None	Controlled by THFC system
#9 Tank Seal Pot Vent	None	Controlled by THFC system
Acid Water Tank Seal Pot	None	Controlled by THFC system
Wastewater Tank Seal Pot	None	Controlled by THFC system
Acid Water Tank Seal Pot	None	Controlled by THFC system

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Emission Point	Frequency	Evaluation
Wastewater Tank Seal Pot	None	Controlled by THFC system
East Mud Tank Seal Pot	None	Controlled by THFC system
West Mud Tank Seal Pot	None	Controlled by THFC system
CO Phos Trap Seal Pot	Weekly	See/No See (1.8)
554/508 Mud Tank Seal Pot	None	Controlled by THFC system
Phosphorus Loading Leg	Weekly	See/No See (1.8)
Phosphorus Loading Sump	Weekly	See/No See (1.8)

¹ The vector truck is operated intermittently so the visible emissions inspection is required only monthly.² This point source is only used during an excess emissions event and is reported following the excess emissions provisions listed in the permit. No monitoring is required due to this point source being subject to excess emissions reporting requirements when being utilized.

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APPENDIX B

Operation and Maintenance Manual [Operating Permit No. 13-0420-0001-00, 7/18/79]

OPERATIONAL AND MAINTENANCE PROCEDURES

P₄ Production, at its Soda Springs, Idaho, plant, has established an ongoing operations audit program to assure the efficient operation of various air pollution control systems currently permitted by the state of Idaho under Permit No. 13-0420-0001-01. Weekly air emission audits are conducted by the Environmental Control Group independent of and in addition to, the more frequent operating department operational audits.

A monthly Air Emissions Audit Report form (Attachment A) summarizing the weekly Environmental Control Group's audits shall be mailed to the Department of Environmental Quality, Pocatello Regional Office by the 10th day of the following month. The targets established for the Environmental Control Group's audits represent closely the best possible operating conditions for each air pollution control system. However, the actual audit scores are only indicators of control system performance and are not to be used to determine compliance of the control systems with permit emissions limitations. Emissions from the air pollution control systems may still meet the *Rules for the Control of Air Pollution in Idaho* even when the actual audit scores are significantly less than the audit target scores because of the stringent audit targets. A deviation from the target scores initiates an investigation by plant personnel to define and accomplish necessary corrective actions. Any changes in established environmental control audits shall be submitted to the Pocatello Regional Office for their approval before the changes are made. Approval of the change in the established environmental control audits shall be presumed unless the Pocatello Regional Office denies the requested change within thirty (30) days of its receipt of such request.

STACK COMPLIANCE CERTIFICATION TESTING

Stack testing to certify emission limitations on all baghouses shall be conducted when visible emissions consistently exceed 5% opacity and the Department requests such testing.

P₄ Production shall give the Department 15 days notice of any stack compliance testing. The stack compliance testing results shall be summarized on the Department-approved "Stack Compliance Testing Form" and mailed to the Department. Stack testing methods for compliance certification must be approved by the Department before testing begins.

GENERAL CONDITIONS

P₄ Production may submit changes to or revisions to the operational and maintenance procedures to the Department for approval when new sources are permitted or when other conditions warrant such changes or revisions. Operational and maintenance procedures and specifications are to be developed and added to this manual for new sources as they come into existence.